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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY -- NEWARK

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**Chapter 13**

In re:

Case No. 22-16619-VFP

Sean Lewis

Hearing Date: 12/15/22 @ 10:00 am.

Debtor

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**ATTORNEY'S RESPONSE TO TRUSTEE'S OBJECTION TO PROPOSED SALE OF  
REAL PROPERTY LOCATED AT 110 MALLORY AVENUE, APT. 7, JERSEY CITY,  
NJ 07304**

I, Nicholas Fitzgerald, the above named debtor's counsel, hereby certifies as follows:

1. I make this certification in response to the Chapter 13 trustee's objection to the debtor's motion to sell real property located at 110 Mallory Avenue, Apt. 7, Jersey city, NJ 07304 for a sale price of \$120,000.

2. Each of the grounds for objection have been satisfied:

a) There is a valuation of the property annexed to the sale motion. See Exhibit C annexed to the sale motion.

b) A relator to sell the real property has already been retained. See Pacer Docket No. 17 for the application to retainer the broker and Packer No. 23 for the Order retaining the broker.

c) Since this is a 100% plan and since the property being

sold is not the debtor's residence but rather is an investment property, the proposed order states that the **entire** net proceeds of the sale are to be turned over to the trustee without an exemption to be paid to the debtor.

3. Accordingly, we hope that the trustee withdraws her objection to the debtor's sale motion.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 21, 2022

  
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Nicholas Fitzgerald  
Debtor's Counsel